

Patrick G. Byrne (Nevada Bar #7636)
Erin M. Gettel (Nevada Bar #13877)
SNELL & WILMER L.L.P.
1700 South Pavilion Center Drive
Suite 700
Las Vegas, Nevada 89135-1865
Telephone: 702.784.5200
Facsimile: 702.784.5252
Email: pbyrne@swlaw.com
egettel@swlaw.com

Michael A. Parks, IL 6217230
(*pro hac vice forthcoming*)
Sartouk H. Moussavi, IL 6313554
(*pro hac vice forthcoming*)
THOMPSON COBURN LLP
55 East Monroe Street, 37th Floor
Chicago, IL 60603
P: (312) 346-7500; F: (312) 580-2201
mparks@thompsoncoburn.com
smoussavi@thompsoncoburn.com

Attorneys for Plaintiff ASIS International, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTHERN DIVISION

ASIS INTERNATIONAL, INC.,

Plaintiff,

vs.

BOARD OF EXECUTIVE PROTECTION
PROFESSIONALS, INC.,

Defendant.

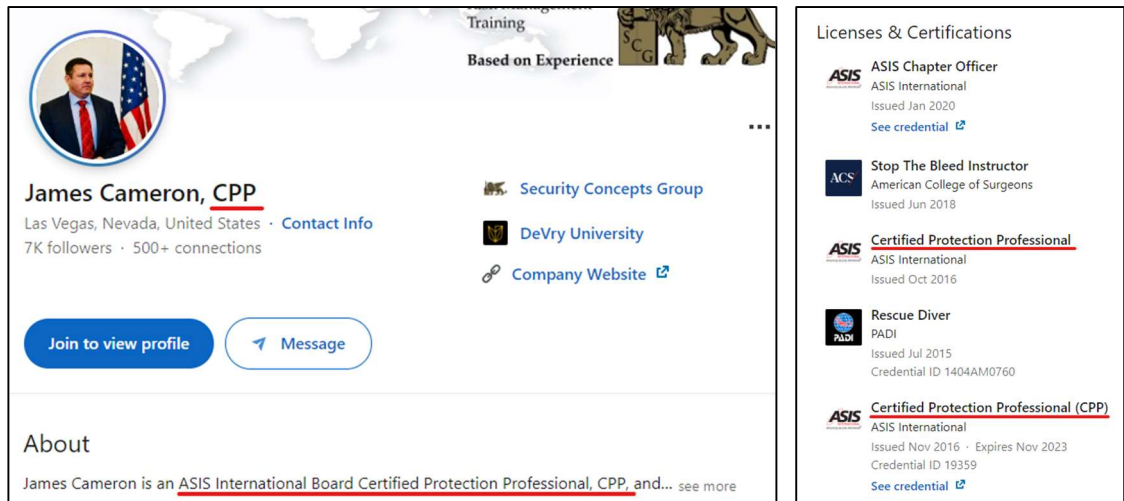
Case No.

**COMPLAINT FOR WILLFUL
TRADEMARK INFRINGEMENT**

Jury Trial Demanded

INTRODUCTION

1. In the 1970's, ASIS International, Inc. ("ASIS"), a global association for security management professionals, developed its "Certified Protection Professional" a/k/a "CPP" certification program, which, over the next several decades, came to be recognized as one of the most prestigious certifications in the security industry. Over 40 years later, one of ASIS's members – who himself proudly boasts his CPP certifications, as seen on his LinkedIn page below – started a new company and began offering a security certification which the company called "Certified Executive Protection Professional" a/k/a "CEPP" certification – *i.e.* marks nearly identical to ASIS's incontestable "Certified Protection Professional" and "CPP" trademarks.



2. In 2022, ASIS became aware of the infringing conduct of Mr. Cameron's company, Board of Executive Protection Professionals, Inc. ("BEPP"). Around that same time, ASIS learned that BEPP had also filed a federal trademark application for a mark nearly identical to ASIS's "Certified Protection Professional" – *i.e.* "Certified Executive Protection Professional" – which also copied, nearly verbatim, the entirety of ASIS's federal trademark application (*i.e.* the description of services in the same trademark classes).

3. At that time, ASIS notified BEPP of its infringement. Shortly thereafter, Mr. Cameron responded, stating that "CEPP references have been removed from the website." Around that same time, BEPP also abandoned its trademark application for "Certified Executive Protection Professional."

4. Despite this, two years later, BEPP shockingly has not only begun once again to use the infringing “Certified Executive Protection Professional” mark, but also filed a new trademark application for the same mark it previously abandoned. And further, BEPP has also begun using other additional confusingly-similar marks that improperly trade off ASIS’s goodwill built over nearly half-a-century, and which are likely to confuse security practitioners.

5. In order to stop BEPP’s willful infringement once and for all, ASIS has been forced to file this lawsuit and, accordingly, seeks treble damages, injunctive relief, and its attorneys’ fees.

PARTIES

6. Plaintiff ASIS International, Inc. (“Plaintiff” or “ASIS”) is a Delaware company with its headquarters at 1625 Prince Street, Alexandria, Virginia 22314.

7. Upon information and belief, Defendant Board of Executive Protection Professionals, Inc. (“Defendant” or “BEPP”) is a Nevada company with a listed address of 8131 Dolce Flore Ave., Las Vegas, Nevada 89178.

JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) over the Lanham Act claims against BEPP. The federal claims arise under the trademark laws of the United States, specifically 15 U.S.C. §§ 1051 *et seq.* Subject matter jurisdiction exists over any remaining claims under 28 U.S.C. § 1367(a) because the claims are so related that they form part of the same case or controversy.

9. This Court has personal jurisdiction over BEPP because BEPP has a principal place of business in this jurisdiction and because the causes of action asserted here arise from BEPP’s infringing and unfair business practices in this jurisdiction.

10. Venue is proper in this District under 28 U.S.C. § 1391 because BEPP is subject to personal jurisdiction in this district, has committed acts of infringement in this district, has a regular and established place of business in this district, a substantial part of the events or omissions giving rise to the claims occurred in this judicial district, and a substantial part of property that is subject of the action is situated in this judicial district.

FACTS COMMON TO ALL COUNTS

A. ASIS's Business

11. ASIS is a globally recognized, nonprofit organization that serves professionals in the security management industry.

12. Founded in 1955, ASIS (previously known as the American Society for Industrial Security) is dedicated to advancing the field of security by providing resources, education, certifications, and networking opportunities for security professionals worldwide.

13. ASIS supports a wide range of industries, including executive protection, corporate security, law enforcement, loss prevention, physical security, cybersecurity, and more.

14. ASIS organizes conferences, provides standards and guidelines for security practices, and advocates for the security profession globally. Its members include security professionals, risk managers, law enforcement officers, and others involved in protecting people, property, and information.

15. ASIS maintains partnerships with public and private organizations in the U.S. and around the world to provide opportunities for ASIS's members to engage on issues that affect security professionals.

16. Such organizations include Aspen Institute's Cybersecurity Risk Council; AWS Bundesverband; Building Industry Consulting Service International (BICSI); Bureau of Alcohol, Tobacco, Firearms & Explosives (ATF); Canadian Security Association (CANASA); Cybersecurity and Infrastructure Security Agency (CISA); Department of Homeland Security Office of Intelligence & Analysis (DHS-I&A); Department of Homeland Security Science & Technology Directorate (DHS-S&T); Federal Bureau of Investigation (FBI); HostageUS; Infragard National Member Alliance (INMA); International Association of Chiefs of Police (IACP); National Sheriff's Association (NSA); National Center for Missing and Exploited Children (NCMEC); Office of the Director of National Intelligence (ODNI); Overseas Security Advisory Council (OSAC); and Security Industry Association (SIA).

17. ASIS has many members, including professionals from a wide range of industries and backgrounds who are involved in various aspects of security management.

18. Generally speaking, ASIS members fall into certain categories: security practitioners (*e.g.*, corporate security managers, physical security specialists, loss prevention professionals, cybersecurity experts, risk managers); executive protection professionals; law enforcement and military personnel; consultants (*e.g.*, security consultants who advise businesses and organizations on risk management, security assessments, and threat mitigation); academics and researchers (*e.g.* researchers in the fields of security, criminology, risk management); security vendors and service providers (*e.g.*, companies providing security technologies, products, and services such as surveillance systems, alarm systems, cybersecurity tools); and students (aspiring security professionals such as students pursuing degrees in criminal justice, etc.).

19. One reason members join ASIS is to access educational resources, industry standards certification, networking opportunities, and professional development tools to further their careers in security management and related fields.

20. A key aspect for ASIS members is that ASIS provides various accredited certifications to security professionals. Such certifications include the Certified Protection Professional (CPP) certification, the Professional Certified Investigator (PCI) certification, the Physical Security Professional (PSP) certification, and the Associate Protection Professional (APP) certification, each of which is highly regarded in the security profession.

B. ASIS's "Certified Protection Professional" and "CPP" Certifications and Marks

21. At least as early as 1977-1978, ASIS has offered a certification for security professionals called "Certified Protection Professional," or "CPP."

22. ASIS's Certified Protection Professional/CPP credential is designed for individuals in the security management field who have demonstrated expertise in various areas of security, including risk management, investigations, personnel security, executive protection, crisis management, threat assessment, emergency planning, physical security, and business continuity.



23. To become a "Certified Protection Professional," candidates must meet certain eligibility requirements, including a combination of education and professional experience in

1 security management, as well as passing a comprehensive exam that tests knowledge across
2 multiple areas of security management.

3 24. Recognized throughout the United States and globally, the Certified Protection
4 Professional/CPP certification is understood by the relevant public as a mark of excellence in the
5 field of security management.

6 25. Thus, for nearly half a century, ASIS has continuously used “Certified Protection
7 Professional” and “CPP” as trademarks in the field of security management and protection.

8 26. ASIS owns the following federal trademark registrations related to its “Certified
9 Protection Professional” and “CPP” brand (collectively, “the ASIS CPP Marks”):

Mark	Reg. Number	Year of First Use
CERTIFIED PROTECTION PROFESSIONAL	4,196,805	1978
CPP	1,950,033	1977
CPP	2,624,248	1978
	2,658,777	1977
	2,768,947	1997

17 27. Under the ASIS CPP Marks, ASIS offers a variety of services, including, but not
18 limited to preparing, administering and scoring of standardized tests in the field of industrial
19 security management and protection and conducting educational courses in industrial security
20 management and protection; testing, analysis and evaluation of the knowledge, skills and abilities
21 of others for the purpose of certification and re-certification in the field of industrial security
22 management and protection; and conducting an educational course in industrial security and
23 protection.

24 28. As a result of its longstanding use of the ASIS CPP Marks, and the significant
25 resources expended on marketing and promotion throughout the years, the ASIS CPP Marks have
26 come to serve as a symbol of the high quality services, including certification services, offered by
27 ASIS.
28

1 29. As a consequence of ASIS’s continuous use of the ASIS CPP Marks in the field of
2 security protection and management throughout the United States, and due to the significant
3 investment of time, money, effort, and popularity of the marks, the ASIS CPP Marks have acquired
4 value and are well-known to the consuming public and trade as identifying and distinguishing of
5 its source.

6 30. Further, the ASIS CPP Marks are “incontestable,” meaning that various aspects of
7 the ASIS CPP Marks cannot be challenged by third parties including, for example, the validity of
8 marks.

9
10 **C. BEPP’s Willfully Infringing Conduct**

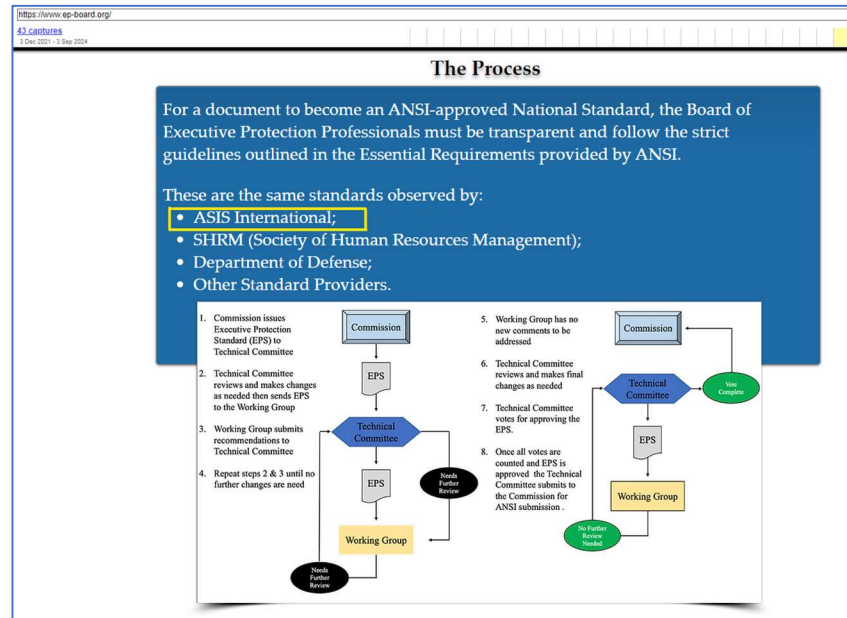
11 31. In 2022, decades after ASIS established rights in the ASIS CPP Marks, ASIS
12 became aware that BEPP had begun use of a nearly identical mark: “Certified Executive Protection
13 Professional.”

14 32. Similar to ASIS’s abbreviated “CPP” mark, BEPP also began using the nearly
15 identical “CEPP” mark.

16 33. ASIS also learned that BEPP had also sought to federally register the mark
17 “Certified Executive Protection Professional” (Serial Number 90/643,874, the “’874 Application”)
18 with the U.S. Patent and Trademark Office on April 14, 2021.

19 34. On or around February 10, 2022, ASIS sent a letter to James Cameron, Chairman of
20 BEPP, informing BEPP of ASIS’s federal trademark registration for “Certified Protection
21 Professional,” Reg. No. 4,196,805, and that use of “Certified Executive Protection Professional”
22 would infringe ASIS’s “Certified Protection Professional” trademark registration. *See Exhibit A.*

23 35. In ASIS’s letter dated February 10, 2022, ASIS noted that BEPP’s infringing
24 conduct further included express reference to ASIS (as shown below), increasing the likelihood of
25 confusion between the ASIS CPP Marks and BEPP.
26
27
28



36. In response to ASIS’s letter dated February 10, 2022, Mr. Cameron of BEPP responded that the infringing uses had been “removed from the website.” See **Exhibit B**.

37. Notably, Mr. Cameron has been a member of ASIS since January 5, 2016.

38. In fact, Mr. Cameron proudly boasts his CPP certifications, which he has had since at least November 1, 2016.

39. Accordingly, Mr. Cameron and BEPP were aware of the ASIS CPP Marks before BEPP began using and applying “Certified Executive Protection Professional” for registration.

40. In addition to the fact that a member of ASIS who was aware of the ASIS CPP Marks began using a nearly identical name and abbreviation (*i.e.*, “Certified Protection Professional” and “CPP” vs. “Certified Executive Protection Professional” and “CEPP”), there are other indicators that BEPP was attempting to merely copy and trade on the goodwill of the ASIS CPP Marks.

41. For example, in its application for the nearly-identical “Certified Executive Protection Professional” (Serial Number 90/643,874) mark, for its goods and services description, BEPP essentially copied the ASIS’s goods and services description from ASIS’s “Certified Protection Professional” registration in the same exact classes (Class 41 and 42).

42. In the chart below, compare the column on the left, which shows ASIS's goods and services description for its mark filed in 2011, to BEPP's goods and services filed in 2021, in the right column. BEPP copied ASIS's application nearly verbatim.

ASIS's Description from Reg. No. 4,196,805 in Class 41	BEPP's Description from Ser. No. 90/643,874 in Class 41
Preparing, administering and scoring of standardized tests in the field of industrial security management and protection and conducting educational courses in industrial security management and protection	Preparing, administering and scoring of standardized tests in the field of Personal Executive Protection, Personal Security Management and conducting educational courses in Personal Executive Protection, Personal Security Management

ASIS's Description from Reg. No. 4,196,805 in Class 42	BEPP's Description from Ser. No. 90/643,874 in Class 42
Testing, analysis and evaluation of the knowledge, skills and abilities of others for the purpose of certification and re-certification in the field of industrial security management and protection	Testing, analysis and evaluation of the knowledge, skills and abilities of others for the purpose of certification and re-certification in the field of personal Executive Protection and personal security management. This not the same as other certifications which deal in other aspects of security ; Testing, analysis and evaluation of service providers to determine conformity with established accreditation standards; Development of voluntary standards for Executive Protection Providers; Developing quality control standards for Executive Protection Providers

43. BEPP's attempt to include the self-serving qualifier that this description was "not the same as other certifications which deal in other aspects of security" (annotated in red above) notwithstanding, BEPP's awareness of ASIS's CPP marks, adoption of nearly identical marks, and attempt to register them using the same goods and services in the same classes is evidence of BEPP's willful infringement.

44. Notably, after being contacted by ASIS regarding BEPP's infringing conduct, BEPP's '874 Application for "Certified Executive Protection Professional" was abandoned.

45. However, despite its awareness of the ASIS CPP Marks, its express acknowledgment of ASIS's allegations in its trademark rights, its removal of the infringing marks, and the abandonment of the '874 Application in 2022, BEPP astoundingly reemerged in 2024 again

1 using the same infringing marks and again attempting to seek registration with the U.S. Patent and
2 Trademark Office.

3 46. On or around September 13, 2024, ASIS sent another letter to Mr. Cameron of BEPP
4 regarding BEPP's renewed willful infringement by its use of "Certified Executive Protection
5 Professional." *See Exhibit C.*

6 47. Despite this notice, not only has BEPP refused to cease its infringement, ASIS has
7 also learned that BEPP is concurrently using ASIS's platforms – which Mr. Cameron of BEPP has
8 access to via his ASIS membership – to further BEPP's certification interests, as seen, *e.g.*, in
9 **Exhibit D** and in the screenshot below:



10 48. BEPP's willful infringement of ASIS trademark rights is apparent.

11 COUNT I

12 Willful Trademark Infringement under 15 U.S.C. § 1114

13 49. ASIS adopts and incorporates by reference the allegations of the preceding
14 Paragraphs 1-48 as if fully set forth herein.

15 50. Section 1114 of the Lanham Act precludes the use in commerce of any reproduction,
16 counterfeit, copy, or colorable imitation of a registered mark in connection with the sale, offering
17 for sale, distribution, or advertising of any goods or services on or in connection with which such
18 use is likely to cause confusion, or to cause mistake, or to deceive.
19

1 51. ASIS owns valid U.S. trademark registrations for the ASIS CPP Marks as identified
2 above.

3 52. BEPP's use of "Certified Executive Protection Professional," "CEPP," "Executive
4 Protection Professional," and "Close Protection Professional" ("the Infringing Marks") in the field
5 of security management and protection is likely to cause confusion, or to cause mistake, or to
6 deceive as to the ASIS CPP Marks, in violation of 15 U.S.C. § 1114.

7 53. On information and belief, BEPP deliberately adopted and/or is using the Infringing
8 Marks with a bad faith intent to cause consumer confusion and/or trade on the goodwill established
9 by ASIS since 1978.

10 54. Upon information and belief, BEPP's trademark infringement was and is intentional
11 and willful.

12 55. BEPP's use of the Infringing Marks has caused and continues to cause damage and
13 irreparable harm to ASIS, for which ASIS has no adequate remedy at law.

14 56. BEPP's willful and continued use of the Infringing Marks, after having notice of the
15 ASIS CPP Marks and multiple requests by ASIS to cease all use of the marks, makes this case an
16 exceptional case for which an award of ASIS's reasonable attorneys' fees and costs are warranted.

17 **COUNT II**

18 **Trademark Infringement and Unfair Competition under 15 U.S.C. § 1125**

19 57. ASIS adopts and incorporates by reference the allegations of the preceding
20 Paragraphs 1-48 as if fully set forth herein.

21 58. Section 1125(a) of the Lanham Act precludes use in commerce of any word, term,
22 or name likely to cause confusion as to the affiliation, connection or association as to the origin or
23 sponsorship of goods or services by another person.

24 59. Through extensive and continuous use of its "Certified Protection Professional" and
25 "CPP" related-trademarks in the field of security management and protection since as early as 1978,
26 ASIS has established trademark rights in the ASIS CPP Marks.

27 60. BEPP's unauthorized use of the Infringing Marks in the field of security
28 management and protection is likely to cause confusion, mistake, or deception among consumers

1 as to the source, quality, affiliation, sponsorship or authenticity of the parties' goods and/or
2 services—depriving ASIS of the goodwill established in the ASIS CPP Marks.

3 61. On information and belief, BEPP deliberately adopted and/or is using the Infringing
4 Marks with a bad faith intent to cause consumer confusion and/or trade on the goodwill established
5 by ASIS since 1978.

6 62. BEPP's use of the Infringing Marks in the field of security management and
7 protection, unless retrained and enjoined, will cause and continue to cause consumer confusion and
8 irreparable harm, damage and injury to ASIS for which ASIS has no adequate remedy at law.

9 63. BEPP's willful and continued use of the Infringing Marks, after having notice of the
10 ASIS CPP Marks and multiple requests by ASIS to cease all use of the marks, makes this case an
11 exceptional case for which an award of ASIS's reasonable attorneys' fees and costs are warranted.

12 **COUNT III**
13 **Common Law Trademark Infringement**

14 64. ASIS adopts and incorporates by reference the allegations of the preceding
15 Paragraphs 1-48 as if fully set forth herein.

16 65. Through extensive and continuous use of the ASIS CPP Marks since as early as
17 1978, ASIS has established trademark rights in the ASIS CPP Marks.

18 66. BEPP's unauthorized use of the Infringing Marks in the field of security
19 management and protection is likely to cause confusion, mistake, or deception among consumers
20 as to the source, quality, affiliation, sponsorship or authenticity of the parties' goods and/or
21 services—depriving ASIS of the goodwill established in the ASIS CPP Marks.

22 67. On information and belief, BEPP deliberately adopted and/or is using the Infringing
23 Marks with a bad faith intent to cause consumer confusion and/or trade on the goodwill established
24 by ASIS since 1978.

25 68. BEPP'S use of the Infringing Marks in the field of security management and
26 protection, unless retrained and enjoined, will cause and will continue to cause consumer confusion
27 and irreparable harm, damage and injury to ASIS for which ASIS has no adequate remedy at law.
28

COUNT IV
Deceptive Trade Practice – NRS 41.600(2)(e); NRS 598.0915

69. ASIS adopts and incorporates by reference the allegations of the preceding Paragraphs 1-48 as if fully set forth herein.

70. Under Nevada law, “an action may be brought by any person who is a victim of consumer fraud,” which includes the deceptive trade practices defined under NRS 598.0915-.0925, inclusive. *See* NRS 41.600(2)(e).

71. Under Nevada law, deceptive trade practices include (a) knowingly passing off goods or services for sale as those of another person, and (b) knowingly making a false representation as to the source, sponsorship, approval, or certification of goods or services for sale. *See* NRS 598.0915 (a)-(b).

72. By its use of the Infringing Marks, BEPP knowingly has passed and is passing off its services as ASIS, and had made and is making false representation as to the source, sponsorship, approval, and/or certification of services for sale.

73. BEPP’s deceptive trade practices has caused consumer confusion and irreparable harm to ASIS.

74. BEPP’s deceptive trade practices have also resulted in ASIS suffering monetary harm.

75. ASIS has been forced to retain counsel to prosecute this action and is thus entitled to an award of reasonable attorneys’ fees and costs, as provided by law.

PRAYER FOR RELIEF

WHEREFORE, ASIS prays that this Court enter judgment against BEPP as follows:

a) Preliminary and permanently enjoining BEPP’s use of “Certified Executive Protection Professional,” “CEPP,” “Executive Protection Professional,” and “Close Protection Professional” as a service mark, certification mark, product name, tradename, trademark, domain name, or any in any other use;

b) Award ASIS damages resulting from BEPP’s infringement of ASIS’s protectable trademark rights;

1 c) Order an accounting for all gains, profits, and advantages derived from BEPP's acts
2 of infringement of ASIS's trademarks pursuant to 15 U.S.C. § 1117;

3 d) Find the case to be exceptional and award appropriate relief thereunder;

4 e) Find that BEPP willfully infringed ASIS's trademark and must pay ASIS enhanced
5 damages due to BEPP's willful infringement;

6 f) Award damages and injunctive relief pursuant to NRS 41.600(3);

7 g) Award ASIS its reasonable attorneys' fees;

8 h) Award ASIS interest and costs;

9 i) Order BEPP to expressly abandon any trademark applications and surrendering any
10 trademark registrations for the Infringing Marks;

11 j) BEPP must report to this Court of its compliance with the foregoing within thirty
12 (30) days of judgment; and

13 Ordering or awarding ASIS any such other relief that the Court deems just and proper under
14 the circumstances.

15 **JURY DEMAND**

16 ASIS demands a trial by jury on all issues triable to a jury.

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Snell & Wilmer
L.L.P.
LAW OFFICES
1700 South Pavilion Center Drive, Suite 700
Las Vegas, Nevada 89135-1865
702.784.5200

1 Dated: February 12, 2025

Respectfully submitted,

2 SNELL & WILMER L.L.P.

3 By: /s/ Patrick G. Byrne

4 Patrick G. Byrne (Nevada Bar #7636)
5 Erin M. Gettel (Nevada Bar #13877)
6 1700 South Pavilion Center Drive, Suite 700
7 Las Vegas, Nevada 89135-1865
8 pbyrne@swlaw.com
9 egettel@swlaw.com

10 Michael A. Parks, IL 6217230
11 (pro hac vice forthcoming)
12 Sartouk H. Moussavi, IL 6313554
13 (pro hac vice forthcoming)
14 THOMPSON COBURN LLP
15 55 East Monroe Street, 37th Floor
16 Chicago, IL 60603
17 P: (312) 346-7500; F: (312) 580-2201
18 mparks@thompsoncoburn.com
19 smoussavi@thompsoncoburn.com

20 *Attorneys for Plaintiff ASIS International, Inc.*

EXHIBIT A

ASIS 2/10/22 Letter to James Cameron

EXHIBIT A

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN, LLP
1747 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 785-9500
FAX: (202) 835-0243

GEORGE D. WEBSTER (1921-1996)
CHARLES E. CHAMBERLAIN (1917-2002)
J. COLEMAN BEAN (1928-2017)

*NOT ADMITTED TO D.C. BAR

ARTHUR L. HEROLD
ALAN P. DYE
JOHN W. HAZARD, JR.
HUGH K. WEBSTER
DAVID P. GOCH
JAMES S. WILSON, JR.
HEIDI K. ABEGG
SARAH E. MOONEY
LAUREN L. DOCKTER*
CHARLES M. WATKINS
DAVID M. ABRAHAMS
JOHN R. STROUT
ANDREW C. DYE
DAVID S. LIEBERMAN

February 10, 2022

Via Federal Express No. 776014579501

Mr. James Cameron, CPP
Chairman
Board of Executive Protection Professionals
8131 Dolce Flore Avenue
Las Vegas, Nevada 89178

Re: Trademark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL

Dear Mr. Cameron:

We are the attorneys for ASIS International (ASIS) and have been contacted regarding use by the Board of Executive Protection Professionals of a trademark that is nearly identical to our client's well known and federally registered trademark CERTIFIED PROTECTION PROFESSIONAL. (Copy of Registration No. 4,196,805, enclosed). The Board of Executive Protection Professionals has adopted, and initiated use of the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL (CEPP) in connection with security educational programs marketed to individuals who are closely associated with ASIS and who are familiar with ASIS's nearly identical educational programs. The advertisement for the CEPP program even mentions ASIS in its promotional materials (<https://www.ep-board.org/>).

ASIS's trademark CERTIFIED PROTECTION PROFESSIONAL is a widely recognized mark of worldwide prominence and broad registration both here in the United States and in many foreign countries. The acronym for this mark, CPP, is also quite well known and well-registered. The adoption, use and promotion by the Board of Executive Protection Professionals of a mark that is nearly identical to ASIS's CERTIFIED PROTECTION PROFESSIONAL trademark amounts to blatant trademark infringement and is bound to lead to confusion within the industrial security profession as to the source of the

WEBSTER, CHAMBERLAIN & BEAN

James Cameron
February 10, 2022
Page Two

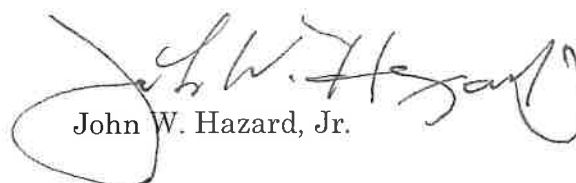
services being promoted by both ASIS and the Board of Executive Protection Professionals. The existence and promotion of the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL will undoubtedly lead purchasers and those who are part of the security industry to believe that ASIS is somehow involved with this new mark and the programs and services being offered under it.

We are aware also, that the Board of Executive Protection Professionals has submitted an application to register the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL to the U.S. Trademark Office, in further violation of ASIS's rights in its own registered (and incontestable) mark CERTIFIED PROTECTION PROFESSIONAL.

Our client wishes to settle this matter in an amicable way but cannot ignore the diminution of rights and reputation it is now suffering due to the promotion of services under the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL. We demand that the Board immediately cease all use and promotion of this mark, including its removal from the Board's website, and that it withdraw the application to register this mark now pending in the U.S. Trademark Office. If these demands are not met within fifteen days of the date of this letter, our client will consider and implement all legal remedies available to it including a lawsuit for trademark infringement in a U.S. federal district court.

Please contact us as soon as possible with assurances that these reasonable demands will be met by the Board in a timely manner.

Sincerely,



John W. Hazard, Jr.

Enclo.

JWH:jjr

United States of America

United States Patent and Trademark Office

CERTIFIED PROTECTION PROFESSIONAL

Reg. No. 4,196,805

Registered Aug. 28, 2012

Int. Cls.: 41 and 42

SERVICE MARK

PRINCIPAL REGISTER

ASIS INTERNATIONAL, INC. (DELAWARE CORPORATION)
1625 PRINCE STREET
ALEXANDRIA, VA 22314

FOR: PREPARING, ADMINISTERING AND SCORING OF STANDARDIZED TESTS IN THE FIELD OF INDUSTRIAL SECURITY MANAGEMENT AND PROTECTION AND CONDUCTING EDUCATIONAL COURSES IN INDUSTRIAL SECURITY MANAGEMENT AND PROTECTION, IN CLASS 41 (U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

FOR: TESTING, ANALYSIS AND EVALUATION OF THE KNOWLEDGE, SKILLS AND ABILITIES OF OTHERS FOR THE PURPOSE OF CERTIFICATION AND RE-CERTIFICATION IN THE FIELD OF INDUSTRIAL SECURITY MANAGEMENT AND PROTECTION, IN CLASS 42 (U.S. CLS. 100 AND 101).

FIRST USE 0-0-1978; IN COMMERCE 0-0-1978.

THE MARK CONSISTS OF STANDARD CHARACTERS WITHOUT CLAIM TO ANY PARTICULAR FONT, STYLE, SIZE, OR COLOR.

SEC. 2(F).

SER. NO. 85-335,946, FILED 6-2-2011.

HENRY S. ZAK, EXAMINING ATTORNEY



David S. Kybas

Director of the United States Patent and Trademark Office

EXHIBIT B

James Cameron 2/18/22
Response E-Mail

EXHIBIT B

From: James Cameron

Sent: Friday, February 18, 2022 1:53 PM

To: John W. Hazard Jr. <jhazard@wc-b.com>

Cc: Jason L. Johnson <jjohnson@jljalaw.com>

Subject: Re: Demand letter: Trademark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL

Received. CEPP references have been removed from the website.

James Cameron, CPP

President/CEO

Security Concepts Group LLC



Office 866.724.7565

Mobile: 714.510.0671

Email: jcameron@scg-lv.com

Web: www.scg-lv.com

License: Nevada PILB #1576



Chairman

Board of Executive Protection Professionals

www.ep-board.org



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EXHIBIT C

ASIS 9/13/24 Letter to James Cameron

EXHIBIT C

LAW OFFICES
WEBSTER, CHAMBERLAIN & BEAN, LLP
1747 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006
(202) 785-9500
FAX: (202) 835-0243

ARTHUR L. HEROLD
ALAN P. DYE
JOHN W. HAZARD, JR.
HUGH K. WEBSTER
DAVID P. GOCH
JAMES S. WILSON, JR.
HEIDI K. ABEGG
SARAH E. MOONEY
CHARLES M. WATKINS
DAVID M. ABRAHAMS
JOHN R. STROUT
ANDREW C. DYE
LAUREN L. LEVAN
CONOR P. KELLY

GEORGE D. WEBSTER (1921-1996)
CHARLES E. CHAMBERLAIN (1917-2002)
J. COLEMAN BEAN (1928-2017)

September 13, 2024

Via Federal Express No. 778570678169

Mr. James Cameron, CPP
Chairman
Board of Executive Protection Professionals
8131 Dolce Flore Avenue
Las Vegas, Nevada 89178

Re: **Trademark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL**

Dear Mr. Cameron:

We are the attorneys for ASIS International (ASIS), and have once again been contacted regarding use by the Board of Executive Protection Professionals of a trademark that is nearly identical to our client's well known and federally registered trademark CERTIFIED PROTECTION PROFESSIONAL. (Copy of registration enclosed). The Board of Executive Protection Professionals has once again adopted and has initiated use of the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL (CEPP) in connection with planned security educational programs marketed to individuals who are closely associated with ASIS and who are familiar with ASIS's nearly identical educational programs. The advertisement for the CEPP program even mentions ASIS in its promotional materials (<https://www.ep-board.org/boardcert>).

As you know from our previous correspondence to you in February 2022 (copy of February 10, 2022 letter enclosed), ASIS's trademark CERTIFIED PROTECTION PROFESSIONAL is a widely recognized mark of worldwide prominence and broad registration both here in the United States and in many foreign countries. The acronym for this mark, CPP, is also quite well known and well-registered. The adoption, use and promotion by the Board of Executive Protection Professionals of a mark that is nearly identical to ASIS's CERTIFIED PROTECTION PROFESSIONAL trademark amounts to blatant trademark infringement and is bound to lead to confusion within the industrial security

WEBSTER, CHAMBERLAIN & BEAN, LLP
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profession as to the source of the services being promoted by both ASIS and the Board of Executive Protection Professionals. The existence and promotion of the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL will undoubtedly lead purchasers and those who are part of the security industry to believe that ASIS is somehow involved with this new mark and the programs and services being offered under it.

We are aware also, that the Board of Executive Protection Professionals has submitted a new application to register the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL to the U.S. Trademark Office, in further violation of ASIS's rights in its own registered (and incontestable) mark CERTIFIED PROTECTION PROFESSIONAL (Application Serial No. 98600516). This application apparently replaces the earlier application for the same mark, which we also objected to, and which was subsequently abandoned by BEPP.

As in the past, our client wishes to settle this matter in an amicable way, but cannot ignore the diminution of rights and reputation it is now suffering due to BEPP's display and promotion of planned services under the mark CERTIFIED EXECUTIVE PROTECTION PROFESSIONAL. We demand that the Board immediately cease all use and promotion of this mark, including its removal from the Board's website, and that it withdraw the application to register this mark now pending in the U.S. Trademark Office. If these demands are not met within fifteen days of the date of this letter, our client will consider and implement all legal remedies available to it including a lawsuit for trademark infringement in a U.S. federal district court.

Please contact us as soon as possible with assurances that these reasonable demands will be met by the Board in a timely manner.

Sincerely,


John W. Hazard, Jr.

JWH:jjr
Enclosures

EXHIBIT D

BEPP Use of ASIS Platform

EXHIBIT D

From: James Cameron via ASIS International <DoNotReply@ConnectedCommunity.org>
Sent: Wednesday, October 30, 2024 5:27 PM
To:
Subject: Women in Security Community : Executive Protection Job Analysis survey



Women in Security Community

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Executive Protection Job Analysis survey

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Oct 30, 2024 6:27 PM

[James Cameron](#)

📢 The Executive Protection Job Analysis survey is LIVE! 📢

Help shape the future of Executive Protection! This survey is crucial for developing the Board Certification Exam, which will set the standard for professional validation of competence in Executive Protection.

➡ Take the survey now: [Executive Protection Job Analysis survey](#)

Developed in partnership with [Prometric](#) and 20 dedicated hours by expert volunteers.

James Cameron CPP
President
Security Concepts Group
Las Vegas NV

(866)724-7565
jcameron@scg-lv.com
<http://www.scg-lv.com>

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